

Wyoming Department of Agriculture

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The Wyoming Department of Agriculture is dedicated to the promotion and enhancement of Wyoming's agriculture, natural resources and quality of life.



Dave Freudenthal, Governor
John Eschepare, Director

April 29, 2007

Bureau of Land Management
Casper Field Office
Attn: Eve Bennett
2987 Prospector Drive
Casper, WY 82604-2968

Dear Eve Bennett:

Following are our comments for the Scoping Notice by the Bureau of Land Management (BLM) Casper Field Office (CFO) for the Sand Hills Comprehensive Travel & Transportation Management Plan.

Our comments are specific to our mission: to be dedicated to the promotion and enhancement of Wyoming's agriculture, natural resources, and quality of life. As this proposed project affects our agriculture industry, our natural resources, and the welfare of our citizens, it's important that we be kept informed of proposed actions and decisions and that we continue to be provided the opportunity to express pertinent issues and concerns.

This plan could significantly impact grazing permittees, agriculture producers, landowners, and other citizens, as well as our natural resources, in and near the Sand Hills area. Impacts need to be included in the analysis.

We encourage BLM officials to work with all permittees and agriculture producers to learn of their concerns and recommendations about this plan. These folks are intimately familiar with the area under study and possess irreplaceable long-term, on-the-ground knowledge. They understand that it is in their best interests to continue to serve as stewards of the habitat, forage, and rangeland health in these allotments. They will best appreciate the agricultural practices that will be affected. They are particularly aware of the impacts upon wildlife and livestock habitat of the Sand Hills area. Thus, we strongly recommend BLM officials aggressively address the concerns and recommendations of these stewards during the planning process. Moreover, it is imperative that BLM officials continuously inform all livestock grazing permittees who are directly or indirectly affected of the issues, decisions, and resulting actions regarding these proposed revisions.

Most environmental analyses of proposed plans and projects are woefully deficient in identifying or analyzing social and economic impacts. We

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appreciate the fact that the CFO staff includes numerous environmental specialists, yet few, if any, social and economic analysts. We specifically suggest this plan includes consideration of the social and economic impacts upon livestock grazing and the communities they support in and adjacent to the planning area. Grazing on public lands represents a vital economic value to agriculture producers and to local communities. Impacts on this economic activity, specifically within the affected area and in adjoining areas, need to be included in the study. The loss or impaired ability of livestock grazing operations needs to be evaluated in the analysis.

In addition to its economic value, grazing also represents irreplaceable environmental and social values, contributing to the preservation of open spaces, the scenic vistas and visual beauty of the area, and the traditional image of the historic rural landscapes of Wyoming and the West. Any loss of these important environmental, historic, and social values of livestock grazing to users and visitors of the area and residents of impacted communities should be included in the scope of the study and the social impacts analyzed in the analysis of the plan.

Congressional mandates, federal statutes, and implementing regulations call for multiple use, and these mandates, statutes, and regulations should be an integral part of this plan. Moreover, the plan analysis should evaluate the impact of this project upon the Congressional intent expressed in the Federal Land Policy and Management Act of 1976 to manage public lands in a manner that will provide food and habitat for fish, wildlife, and domestic animals. The impacts upon food and habitat for fish and wildlife are usually well documented. The consequences of this project upon food and habitat for domestic animals deserve the same degree of study and documentation.

Peer-reviewed science should underlie decisions and the analysis needs to identify the science that supports the decisions and discussions regarding this project,

Decisions in the proposed plan should allow BLM officials, grazing permittees and company officials the opportunity to work cooperatively and the flexibility to make the best site-specific, case-by-case decisions that are in the best interests of the affected resources and citizens.

Finally, we want to ensure the plan allows for the continuing opportunity for necessary travel for grazing permittees and other agriculture producers in and adjacent to the Sand Hills area.

In conclusion, we appreciate the opportunity to comment on the proposed Sands Hills Comprehensive Travel & Transportation Management Plan, we encourage continued attention to our concerns, and we look forward to hearing about and being involved in proposed actions and decisions.

Sincerely,

A handwritten signature in black ink, appearing to read "John Etchepare", with a long horizontal flourish extending to the right.

John Etchepare
Director

cc: Governor's Planning Office
Wyoming Game and Fish Department